## **CAUSE NO. DC-21-15669**

| DELICIA CHRISTMAN          | § | IN THE DISTRICT COURT               |
|----------------------------|---|-------------------------------------|
|                            | § |                                     |
| <b>v.</b>                  | § | 160 <sup>th</sup> JUDICIAL DISTRICT |
|                            | § |                                     |
| WALMART INC. AND           | § |                                     |
| WAL-MART STORES TEXAS, LLC | 8 | DALLAS COUNTY, TEXAS                |

## **INDEX OF DOCUMENTS FILED IN STATE COURT**

- 1. Docket Sheet for Case No. DC-21-15669, printed on December 7, 2021;
- 2. Plaintiff's Original Petition, filed on October 22, 2021;
- 3. Enter Demand for Jury, paid on October 11, 2021;
- 4. Return of Service for Wal-Mart Stores Texas, LLC, dated November 10, 2021;
- 5. Return of Service for Walmart, Inc., dated November 10, 2021;
- 6. Defendants' Original Answer, filed on November 29, 2021;
- 7. Defendants' Jury Demand filed on November 29, 2021.

Respectfully submitted,

DAVID/A/JOHNSON

Texas Bar No. 24032598

djohnson@cowlesthompson.com

(214) 672-2186

(214) 672-2386 (Fax)

## STEVEN J. MOSES

Texas Bar No. 24056014 smoses@cowlesthompson.com

(214) 672-2130

(214) 672-2330 (Fax)

## **COWLES & THOMPSON, P.C.**

901 Main Street, Suite 3900 Dallas, TX 75202 (214) 672-2000 (214) 672-2020 (Fax)

## ATTORNEYS FOR DEFENDANTS

## **CERTIFICATE OF SERVICE**

The undersigned certifies that on the 8th day of December 2021, a true and correct copy of the foregoing document was forwarded via the Court's CM/ECF e-filing/service system to the counsel of record for Plaintiff.

STEVEN/J. MOSES

## Case 3:21-cv-03055-X Document Plans **DOCKET SHEET**

Page 3 of 28 PageID 12

**CASE NO. DC-21-15669** 

**DELICIA CHRISTMAN** 

**PLAINTIFF** 

DEFENDANT

WALMART INC., et al

88888

Location: 160th District Court Judicial Officer: **REDMOND, AIESHA**Filed on: 10/22/2021

## CASE INFORMATION

.Case Type: **PROPERTY** 

**PARTY INFORMATION** Lead Attorneys **MAYO-GRAY, AYSIA** Retained 346-980-4600(W) JOHNSON, DAVID AARON Retained

WAL-MART STORES TEXAS, LLC

CHRISTMAN, DELICIA

WALMART INC.

JOHNSON, DAVID AARON

Retained 214-672-2186(W)

214-672-2186(W)

| DATE       | EVENTS & ORDERS OF THE COURT   | INDEX |
|------------|--|-------|
| 10/22/2021 | NEW CASE FILED (OCA) - CIVIL   |       |
| 10/22/2021 | ORIGINAL PETITION  |       |
| 10/25/2021 | REQUEST FOR SERVICE  | 2     |
| 10/25/2021 | SISSUE CITATION  |       |
| 11/04/2021 | CITATION  WALMART INC.  Served: 11/08/2021  WALMART INC  |       |
| 11/04/2021 | CITATION  WAL-MART STORES TEXAS, LLC Served: 11/08/2021  WAL-MART STORES TEXAS LLC                   |       |
| 11/10/2021 | RETURN OF SERVICE  EXECUTED CITATION - WAL-MART STORES TEXAS LLC                                     |       |
| 11/10/2021 | RETURN OF SERVICE  EXECUTED CITATION - WALMART INC   |       |
| 11/29/2021 | ORIGINAL ANSWER - GENERAL DENIAL Party: DEFENDANT WALMART INC.; DEFENDANT WAL-MART STORES TEXAS, LLC |       |
| 11/29/2021 | JURY DEMAND Party: DEFENDANT WALMART INC.; DEFENDANT WAL-MART STORES TEXAS, LLC                      |       |

## Case 3:21-cv-03055-X Documental<sup>P</sup>graphetricy 68/24 Docket Sheet Page 4 of 28 PageID 13

CASE NO. DC-21-15669

| DATE                     | FINANCIAI  | Information  |                                 |
|--------------------------|--|--|---------------------------------|
|                          | DEFENDANT WALMART INC. Total Charges Total Payments and Credits Balance Due as of 12/07/2021       |  | 40.00<br>40.00<br><b>0.00</b>   |
| 11/29/2021<br>11/29/2021 | Charge<br>CREDIT CARD - Receipt # 78559-2021-DCLK<br>TEXFILE (DC)                                  | DEFENDANT WALMART INC.<br>DEFENDANT WALMART INC.             | 40.00 (40.00)                   |
|                          | PLAINTIFF CHRISTMAN, DELICIA Total Charges Total Payments and Credits Balance Due as of 12/07/2021 |  | 308.00<br>308.00<br><b>0.00</b> |
| 10/25/2021<br>10/25/2021 | Charge CREDIT CARD - Receipt # 71383-2021-DCLK TEXFILE (DC)  | PLAINTIFF CHRISTMAN, DELICIA<br>PLAINTIFF CHRISTMAN, DELICIA | 292.00<br>(292.00)              |
| 10/27/2021<br>10/27/2021 | Charge CREDIT CARD - Receipt # 72360-2021-DCLK TEXFILE (DC)  | PLAINTIFF CHRISTMAN, DELICIA<br>PLAINTIFF CHRISTMAN, DELICIA | 16.00<br>(16.00)                |

## STATE OF TEXAS COUNTY OF DALLAS

I, FELICIA PITRE, Clerk of the District of Dallas County, Texas, do hereby certify that I have compared this instrument to be a true and correct copy of the original as appears on record in my office.

FELICIA PITRE, DISTRICT CLERK DALLAS COUNTY, TEXAS

By Ceculin Flowers Deputy

Cecelia Flowers

FELICIA PITRE DISTRICT CLERK DALLAS CO., TEXAS Gay Lane DEPUTY

| CAU                                    | USE NO | DC-21-15669<br>E NO   |  |
|--|--------|-----------------------|--|
| DELICIA CHRISTMAN                      | §      | IN THE DISTRICT COURT |  |
| Plaintiff,                             | §<br>§ | 160th                 |  |
| <b>V.</b>                              | §      | JUDICIAL DISTRICT     |  |
|  | §<br>§ |                       |  |
| WALMART INC. AND                       | §      |                       |  |
| WAL-MART STORES TEXAS, LLC Defendants. | §<br>8 | DALLAS COUNTY, TEXAS  |  |
| Detenuants.                            | 8      | DALLAS COUNTI, ILAAS  |  |

## **PLAINTIFF'S ORIGINAL PETITION**

## TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES DELICIA CHRISTMAN, INDIVIDUALLY, hereinafter called Plaintiff, complaining of and about WALMART INC. and WAL-MART STORES TEXAS, LLC, hereinafter called Defendants, and for cause of action shows unto the Court the following:

I.

## DISCOVERY CONTROL PLAN LEVEL

1. Plaintiff intends that discovery be conducted under Discovery Level 3.

II.

## PARTIES AND SERVICE

- 2. Plaintiff DELICIA CHRISTMAN is an individual whose address is 1316 Woodburn Trail, Dallas, Texas 75241.
- 3. Defendant WALMART INC., a corporation doing business in the State of Texas, may be served with process by serving its Registered Agent, C T Corporation System, at the following address: 1999 Bryan Street, Suite 900, Dallas, Texas 75201-3136. Service of said Defendant as described above can be effected by private process service.

Delicia Christman v. Walmart Inc. and Wal-Mart Stores Texas, LLC 1 – Plaintiff's Original Petition

4. Defendant WAL-MART STORES TEXAS, LLC, a corporation doing business in the State of Texas, may be served with process by serving its Registered Agent, C T Corporation System, at the following address: 1999 Bryan Street, Suite 900, Dallas, Texas 75201-3136. Service of said Defendant as described above can be effected by private process service.

## Ш.

## **JURISDICTION AND VENUE**

- 5. The subject matter in controversy is within the jurisdictional limits of this court.
- 6. Plaintiff seeks:
  - a. Monetary relief of over \$250,000.00 but not more than \$1,000,000.00.
- 7. This court has jurisdiction over the parties because Defendants are corporations doing business in the State of Texas.
- 8. Venue in Dallas County is proper in this cause under Section 15.002(a)(1) of the Texas Civil Practice and Remedies Code because all or a substantial part of the events or omissions giving rise to this lawsuit occurred in this county.

## IV.

## **FACTS**

- 9. On or about September 28, 2021, Plaintiff was a customer at Defendants' store located at 621 Uptown Boulevard, Cedar Hill, Texas 75104.
- 10. As Plaintiff was walking through the store, she slipped and fell on a wet floor that was mopped by Defendants' employee. Defendants did not have a wet floor sign in the area that was just mopped.
- 11. As a direct result of the incident, Plaintiff DELICIA CHRISTMAN was forced to seek medical treatment for her sustained injuries and incurred medical expenses as a result thereof.

V.

## PLAINTIFF'S CLAIM OF NEGLIGENCE

## AGAINST DEFENDANTS

- 12. Defendants had a duty to exercise the degree of care a reasonably careful person would use to avoid harm to others under circumstances similar to those described herein.
- 13. Plaintiff's injuries were proximately caused by Defendants' negligent, careless, and reckless disregard of said duty.
- 14. The negligent, careless, and reckless disregard of duty of Defendants consisted of, but is not limited to, the following acts and omissions:
  - A. In that Defendants had actual or constructive knowledge of some condition on the premises which posed an unreasonable risk of harm; and
  - B. In that Defendants did not exercise reasonable care to eliminate or reduce the risk that proximately caused Plaintiff's injuries.

VI.

## DAMAGES FOR PLAINTIFF DELICIA CHRISTMAN

- 15. As a direct and proximate result of the occurrence made the basis of this lawsuit, and Defendants' acts as described herein, Plaintiff was caused to suffer a loss of, and seeks damages for, amounts within the jurisdictional limits of this Court.
- 16. As a result of the negligent conduct of Defendants, Plaintiff suffered bodily injuries. The injuries have had a serious effect on Plaintiff's health and well-being. As further result of the nature and consequences of Defendants' actions, Plaintiff has suffered great physical and mental pain, suffering, and anguish, and in all reasonable probability will continue to suffer in this manner

for a long time in the future. As a direct and proximate result of the negligent conduct of Defendants, Plaintiff sustained injuries to her back and body in general.

- 17. As a result of the injuries sustained, Plaintiff has incurred reasonable and customary doctor and medical expenses to date for necessary medical treatment.
- 18. From the date of the incident in question until the time of trial, there are certain elements of damages provided by law that Plaintiff is entitled to have the court in this case to consider singularly, together, and combined with others to determine the sum of money that will fairly and reasonably compensate Plaintiff for her injuries, damages, and losses incurred and to be incurred in the future:
  - A. Reasonable medical care and expenses in the past. These expenses were incurred by Plaintiff DELICIA CHRISTMAN for the necessary care and treatment of the injuries resulting from the incident complained of herein and such charges are reasonable and were usual and customary charges for such services in Dallas County, Texas;
  - B. Pain and suffering in the past and pain and suffering in the future;
  - C. Mental anguish in the past;
  - D. Mental anguish in the future;
  - E. Medical expenses;
  - F. Medical expenses in the future;
  - G. Lost wages;
- 19. Because of the injuries sustained by Plaintiff in the occurrence made the basis of this suit, this cause is maintained. As a result of the serious injuries Plaintiff has sustained and other damages for which Plaintiff has previously pled, Plaintiff is entitled to recover damages from

Defendants in this action in the form of monetary relief over \$250,000.00 but not more than \$1,000,000.00 excluding post-judgment interest, depending on what the jury decides to award.

## VII.

## **JURY DEMAND**

20. Pursuant to Texas Rules of Civil Procedure 216, Plaintiff hereby requests a trial by jury.

## VIII.

## PRE-JUDGMENT AND POST-JUDGMENT INTEREST

- 21. Plaintiff seeks to recover pre-judgment and post-judgment interest herein.

  WHEREFORE, PREMISES CONSIDERED, Plaintiff prays that Defendants be cited to appear and answer herein and that upon trial of this cause, Plaintiff be awarded:
  - A. Judgment against Defendants, jointly and/or severally, for past medical expenses in an amount to be determined by the jury;
  - B. Judgment against Defendants, jointly and/or severally, for future medical expenses in an amount to be determined by the jury;
  - C. Judgment against Defendants, jointly and/or severally, for physical pain and suffering in the past in an amount to be determined by the jury;
  - D. Judgment against Defendants, jointly and/or severally, for physical pain and suffering in the future in an amount to be determined by the jury
  - E. Judgment against Defendants, jointly and/or severally, for mental anguish in the past in an amount to be determined by the jury;
  - F. Judgment against Defendants, jointly and/or severally, for mental anguish in the future in an amount to be determined by the jury

- G. Judgment against Defendants, jointly and/or severally, for lost wages in an amount to be determined by the jury;
  - H. Court costs;
- I. Interest on said judgment at the legal rate from the date of judgment until paid;
  - J. Pre-judgment interest;
- K. Together with such other and further relief, general and special, whether at law or in equity, to which Plaintiff may show herself justly entitled.

## IX.

## **MAXIMUM AMOUNT OF DAMAGES**

22. Plaintiff pleads maximum amount of damages to be over \$250,000.00 but not more than \$1,000,000.00 and demands judgment for all other relief to which the jury deems her entitled.

Respectfully Submitted,

**HOLLINS LAW GROUP PLLC** 

By: \_\_\_\_\_

Aysia Mayo-Gray

Texas Bar No. 24109256

6944 Cypress Creek Pkwy., Ste. 200

Houston, TX 77069

346.980.4600

346.980.4610 (Fax)

info@hollinslawgroup.com

**Attorney for Plaintiff** 

**DELICIA CHRISTMAN** 

## PLAINTIFF HEREBY DEMANDS TRIAL BY JURY

Aysia Mayo-Gray

## STATE OF TEXAS COUNTY OF DALLAS

I, FELICIA PITRE, Clerk of the District of Dallas County, Texas, do hereby certify that I have compared this instrument to be a true and correct copy of the original as appears on record in my office.

FELICIA PITRE, DISTRICT CLERK DALLAS COUNTY, TEXAS

By Chilin Flavers Deputy

Cecelia Flowers

## **Automated Certificate of eService**

This automated certificate of service was created by the efiling system. The filer served this document via email generated by the efiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Justin Guerrini on behalf of Aysia Mayo-Gray Bar No. 24109256 j.guerrini@hollinslawgroup.com Envelope ID: 58468979 Status as of 10/25/2021 3:15 PM CST

## **Case Contacts**

| Name            | BarNumber | Email                           | TimestampSubmitted    | Status |
|-----------------|-----------|---------------------------------|-----------------------|--------|
| Justin Guerrini |           | j.guerrini@hollinslawgroup.com  | 10/22/2021 4:06:33 PM | SENT   |
| Aysia Mayo-Gray |           | a.mayo-gray@hollinslawgroup.com | 10/22/2021 4:06:33 PM | SENT   |

# FORM NO. 353-3 - CITATION THE STATE OF TEXAS

To: WAL-MART STORES TEXAS, LLC
BY SERVING ITS REGISTERED AGENT C T CORPORATION SYSTEM
1999 BRYAN STREET SUITE 900
DALLAS TX 75201-3136

## GREETINGS:

expiration of twenty days after you were served this citation and petition, a default judgment may be taken answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the addressed to the clerk of the 160th District Court at 600 Commerce Street, Ste. 101, Dallas, Texas 75202. after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days against you. In addition to filing a written answer with the clerk, you may be required to make initial You have been sued. You may employ an attorney. If you or your attorney do not file a written

Said Plaintiff being DELICIA CHRISTMAN

Filed in said Court 22nd day of October, 2021 against

WALMART INC., WAL-MART STORES TEXAS, LLC

citation is not served, it shall be returned unexecuted. Suit on PROPERTY etc. as shown on said petition, a copy of which accompanies this citation. If this For Suit, said suit being numbered DC-21-15669, the nature of which demand is as follows:

WITNESS: FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas. Given under my hand and the Seal of said Court at office this 4th day of November, 2021.

ATTEST: FELICIA PITRE, Clerk of the District Courts of Dallas, County, Texas

, Deputy

Ву

TERESA JONES

ESERVE

CITATION

DC-21-15669

vs.
WALMART INC., et al

ISSUED THIS
4th day of November, 2021

FELICIA PITRE
Clerk District Courts,
Dallas County, Texas

By: TERESA JONES, Deputy

Attorney for Plaintiff
AYSIA MAYO-GRAY
HOLLINS LAW GROUP PLLC
6944 CYPRESS CREEK PKWY STE 200
HOUSTON TX 77069
346-980-4600
info@holllinslawgroup.com

SERVICE FEES
NOT PAID

FILED
14/10/2021 12:35 PM
FELICIA PITRE
DISTRICT CLERK
DALLAS CO., TEXAS

Daniel Macias DEPUTY

# OFFICER'S RETURN

Case No.: DC-21-15669

Court No.160th District Court

| WALMART INC., et al.  Aday of NOV.  Came to hand on the Sh day of NOV.  within the County of Tadlas 17, 1820    within the County of this Citation together with the accompanying copy of this pleading, having first endorsed on same date of delivery. The distance actually traveled by me in serving such process wasmiles and my fees are as follows: To certify which witness my hand.  For serving such process wasmiles and my fees are as follows: To certify which witness my hand.  For notary Partial 17 fathal 17 fathal 18 before me this 19 day of Taylah County Taylah Count | vs. |
|--|-----|
|--|-----|

## Cecelia Flower

STATE OF TEXAS COUNTY OF DALLAS

I, FELICIA PITRE, Clerk of the District of Dallas County, Texas, do hereby certify that I have compared this instrument to be a true and correct copy of the original as appears on record in my office.

GIVEN UNDER MY HAND AND SEAL of said Court, at office in Dailas, Texas, this The day of December A.D., 2021.

Texas, this The day of Detember A.D., 2021.
FELICIA PITRE, DISTRICT CLERK
DALLAS COUNTY, TEXAS
BY CLEMM HAD LEED Deputy

## FORM NO. 353-3 - CITATION THE STATE OF TEXAS

To: WALMART INC.
BY SERVING ITS REGISTERED AGENT C T CORPORATION SYSTEM
1999 BRYAN STREET SUITE 900
DALLAS TX 75201-3136

## REETINGS:

addressed to the clerk of the 160th District Court at 600 Commerce Street, Ste. 101, Dallas, Texas 75202 after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days against you. In addition to filing a written answer with the clerk, you may be required to make initial expiration of twenty days after you were served this citation and petition, a default judgment may be taken answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the You have been sued. You may employ an attorney. If you or your attorney do not file a written

Said Plaintiff being DELICIA CHRISTMAN

Filed in said Court 22nd day of October, 2021 against

# WALMART INC., WAL-MART STORES TEXAS, LLC

citation is not served, it shall be returned unexecuted. Suit on PROPERTY etc. as shown on said petition, a copy of which accompanies this citation. If this For Suit, said suit being numbered DC-21-15669, the nature of which demand is as follows:

WITNESS: FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas. Given under my hand and the Seal of said Court at office this 4th day of November, 2021.

ATTEST: FELICIA PITRE, Clerk of the District Courts of Dallas, County, Texas

Deputy & A

By

TERESA JONES

ESERVE

CITATION

DC-21-15669

DELICIA CHRISTMAN vs.

WALMART INC., et al

ISSUED THIS
4th day of November, 2021

FELICIA PITRE
Clerk District Courts,
Dallas County, Texas

By: TERESA JONES, Deputy

Attorney for Plaintiff
AYSIA MAYO-GRAY
HOLLINS LAW GROUP PLLC
6944 CYPRESS CREEK PKWY STE 200
HOUSTON TX 77069
346-980-4600
info@holllinslawgroup.com

SERVICE FEES
NOT PAID

11/10/2021 12:40 PM FELICIA PITRE DISTRICT CLERK DALLAS CO., TEXAS

Daniel Macias DEPUTY

# OFFICER'S RETURN

Case No.: DC-21-15669

| Notary Public, State of Texas  Comm. Expires 08-13-2024  Notary ID 132823008   |
|--|
| Notary Public A allah County   |
| Signed and sworn to by the said Nalky Ganua before me this 19 day of Heventher, 20 21, to certify which witness my hand and seal of office.  Taqueluic Certain which witness my hand and seal of office.         |
| For Notary  (Must be verified if served outside the State of Texas.)  For Notary  (Must be verified if served outside the State of Texas.)  For Notary  (Must be verified if served outside the State of Texas.) |
| me in serving such process wasmiles and my fees are as follows: To certify which witness my hand.  For serving Citation \$ 15  |
| each in person, a true copy of this Citation together with the accompanying copy of this pleading, having first endorsed on same date of delivery. The distance actually traveled by                             |
| by delivering to the within nam  |
| ecut   |
| V\$.   |
| Court No. 160th District Court  Style: DELICIA CHRISTMAN   |

STATE OF TEXAS COUNTY OF DALLAS

i, FELICIA PITRE, Clerk of the District of Dalias County, Texas, do hereby certify that I have compared this instrument to be a true and correct copy of the original as appears on record in my office.

GIVEN UNDER MY HAND AND SEAL OF Sald Court, at office in Dalias, Texas, this The day of Deeche, A.D., 202/

PELICIA PITRE, DISTRICT CLERK
DALLAS COUNTY, TEXAS
BY CREELLY FLOWER

Cecelia Flower

Rhonda Burks DEPUTY

## **CAUSE NO. DC-21-15669**

| DELICIA CHRISTMAN          | § | IN THE DISTRICT COURT   |
|----------------------------|---|-------------------------|
|                            | § |                         |
|                            | § | •                       |
| <b>v.</b>                  | § | 160th JUDICIAL DISTRICT |
|                            | § |                         |
| WALMART INC. AND           | § | •                       |
| WAL-MART STORES TEXAS, LLC | § | DALLAS COUNTY, TEXAS    |

## **DEFENDANTS' ORIGINAL ANSWER**

## TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Walmart Inc. and Wal-Mart Stores Texas L.L.C., Defendants in the above-entitled and numbered cause, and file this their Original Answer to Plaintiff's Original Petition, and would respectfully show the Court as follows:

I.

Defendants generally deny the allegations contained in Plaintiff's Original Petition, demands strict proof thereof, and says this is a matter for jury decision.

WHEREFORE, PREMISES CONSIDERED, Defendants pray that upon final hearing hereof, Plaintiff take nothing by this suit, that Defendants recover their costs, and that Defendants have such other and further relief, both at law and in equity, to which it may be justly entitled.

Respectfully submitted,

DAVID A JOHNSON

Texas Bar No. 24032598 <u>djohnson@cowlesthompson.com</u> (214) 672-2186 (214) 672-2386 (Fax)

## STEVEN J. MOSES

Texas Bar No. 24056014 <u>smoses@cowlesthompson.com</u> (214) 672-2130 (214) 672-2330

## **COWLES & THOMPSON, P.C.**

901 Main Street, Suite 3900 Dallas, TX 75202 (214) 672-2000 (214) 672-2020 (Fax)

## ATTORNEYS FOR DEFENDANTS

## **CERTIFICATE OF SERVICE**

This is to certify that on the 29<sup>th</sup> day of November 2021, the foregoing was electronically filed with the Clerk of the Court using the e-filing system which will send notification of such filing to all counsel of record.

DAVID A. JOHNSON

## STATE OF TEXAS COUNTY OF DALLAS

I, FELICIA PITRE, Clerk of the District of Dailas County, Texas, do hereby certify that I have compared this instrument to be a true and correct copy of the original as appears on record in my office.

GIVEN UNDER MY HAND AND SEAL of said Court, at office In Dallas, Texas, this The day of December, A.D., 2021

FELICIA PITRE, DISTRICT CLERK

DALLAS COUNTY, TEXAS

By Club flower Deputy

Cecelia Flowers

## **Automated Certificate of eService**

This automated certificate of service was created by the efiling system. The filer served this document via email generated by the efiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Katherine Henderson on behalf of David Johnson Bar No. 24032598 khenderson@cowlesthompson.com Envelope ID: 59497509 Status as of 11/29/2021 9:46 AM CST

## **Case Contacts**

| Name                | BarNumber | Email                           | TimestampSubmitted    | Status |
|---------------------|-----------|---------------------------------|-----------------------|--------|
| Justin Guerrini     |           | j.guerrini@hollinslawgroup.com  | 11/29/2021 9:39:10 AM | SENT   |
| Aysia Mayo-Gray     |           | a.mayo-gray@hollinslawgroup.com | 11/29/2021 9:39:10 AM | SENT   |
| David AJohnson      |           | djohnson@cowlesthompson.com     | 11/29/2021 9:39:10 AM | SENT   |
| Steven JMoses       |           | smoses@cowlesthompson.com       | 11/29/2021 9:39:10 AM | SENT   |
| Katherine Henderson |           | khenderson@cowlesthompson.com   | 11/29/2021 9:39:10 AM | SENT   |

## Associated Case Party: DELICIA CHRISTMAN

| Name            | BarNumber | Email                    | TimestampSubmitted    | Status |
|-----------------|-----------|--------------------------|-----------------------|--------|
| AYSIA MAYO-GRAY |           | info@hollinslawgroup.com | 11/29/2021 9:39:10 AM | SENT   |

Rhonda Burks DEPUTY

## **CAUSE NO. DC-21-15669**

| DELICIA CHRISTMAN          | §        | IN THE DISTRICT COURT   |
|----------------------------|----------|-------------------------|
|                            | <b>§</b> |                         |
|                            | §        |                         |
| <b>v.</b>                  | §        | 160th JUDICIAL DISTRICT |
|                            | §        |                         |
| WALMART INC. AND           | §        |                         |
| WAL-MART STORES TEXAS, LLC | §        | DALLAS COUNTY, TEXAS    |

## **DEFENDANTS' JURY DEMAND**

## TO THE HONORABLE JUDGE OF SAID COURT:

**COMES NOW**, Walmart Inc. and Wal-Mart Stores Texas, L.L.C., Defendants in the above-entitled and numbered cause, the appropriate jury fee being paid, hereby makes a demand for a jury trial.

Respectfully submitted,

DAVID A. JOHNSON

Texas Bar No. 24032598 <u>djohnson@cowlesthompson.com</u> (214) 672-2186 (214) 672-2386 (Fax)

STEVEN J. MOSES

Texas Bar No. 24056014 <u>smoses@cowlesthompson.com</u> (214) 672-2130 (214) 672-2330

**COWLES & THOMPSON, P.C.** 

901 Main Street, Suite 3900 Dallas, TX 75202 (214) 672-2000 (214) 672-2020 (Fax)

ATTORNEYS FOR DEFENDANTS

## **CERTIFICATE OF SERVICE**

This is to certify that on the 29<sup>th</sup> day of November 2021, the foregoing was electronically filed with the Clerk of the Court using the e-filing system which will send notification of such filing to all counsel of record.

DAVID A. JOHNSON

## STATE OF TEXAS COUNTY OF DALLAS

I, FELICIA PITRE, Clerk of the District of Dallas County, Texas, do hereby certify that I have compared this instrument to be a true and correct copy of the original as appears on record in my office.

GIVEN UNDER MY HAND AND SEAL of said Court, at office in Dallas, Texas, this Type day of December, A.D., 202).

FELICIA PITRE, DISTRICT CLERK DALLAS COUNTY, TEXAS

By Club flawers Deputy

Cecelia Flowers

## **Automated Certificate of eService**

This automated certificate of service was created by the efiling system. The filer served this document via email generated by the efiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Katherine Henderson on behalf of David Johnson Bar No. 24032598 khenderson@cowlesthompson.com Envelope ID: 59498976 Status as of 11/29/2021 10:12 AM CST

## **Case Contacts**

| Name                | BarNumber | Email                           | TimestampSubmitted     | Status |
|---------------------|-----------|---------------------------------|------------------------|--------|
| David AJohnson      |           | djohnson@cowlesthompson.com     | 11/29/2021 10:01:51 AM | SENT   |
| Steven JMoses       |           | smoses@cowlesthompson.com       | 11/29/2021 10:01:51 AM | SENT   |
| Justin Guerrini     |           | j.guerrini@hollinslawgroup.com  | 11/29/2021 10:01:51 AM | SENT   |
| Aysia Mayo-Gray     |           | a.mayo-gray@hollinslawgroup.com | 11/29/2021 10:01:51 AM | SENT   |
| Katherine Henderson |           | khenderson@cowlesthompson.com   | 11/29/2021 10:01:51 AM | SENT   |

## Associated Case Party: DELICIA CHRISTMAN

| Name            | BarNumber | Email                    | TimestampSubmitted     | Status |
|-----------------|-----------|--------------------------|------------------------|--------|
| AYSIA MAYO-GRAY | -         | info@hollinslawgroup.com | 11/29/2021 10:01:51 AM | SENT   |